



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Jacob K. Javits Federal Building
26 Federal Plaza, 37th Floor
New York, New York 10278*

March 26, 2025

BY ECF

The Honorable Victor Marrero
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Nikhil Gupta*, S2 23 Cr. 289 (VM)

Dear Judge Marrero:

The Government writes, with the consent of the defense, to adjust the proposed schedule jointly submitted by the parties on March 21, 2025. (Dkt. 42). Due to the need for intra-Governmental coordination, the Government respectfully requests that its *ex parte* classified motion pursuant to Section 4 of the Classified Information Procedures Act (“CIPA”) be due on July 11, 2025 instead of May 15, 2025. Under this proposal, the Rule 12 and CIPA briefing would be complete on the same date. The revised proposed schedule is as follows:

- May 15, 2025: Defense Rule 12 motions due
- June 20, 2025: Government’s opposition to Defense Rule 12 motions due
- July 11, 2025: Defense reply in support of Rule 12 motions and Government’s CIPA Section 4 motion due
- Any date in August 2025: Conference or hearing on pretrial motions
- Six weeks before trial: Motions *in limine*, joint requests to charge, joint proposed voir dire, and joint list of names, entities, and locations due
- Four weeks before trial: Opposition to motions *in limine* due
- Three weeks before trial: Replies in support of motions *in limine* due
- Two weeks before trial: Final pretrial conference
- Any date in November 2025: Trial


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The parties are available to discuss the proposed schedule further at the conference on March 28, 2025.

Respectfully submitted,

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cc: Michael Rooney, Esq. (by ECF)
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